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WESTINGHOUSE ELECTRIC CORPORATION
ENGINEERING SERIVCE DIVISION
1180 ANDOVER PARK WEST
SEATTLE, WA. 98188
(206) 575-2345

August 11, 1989

Ash Grove Cement West, Inc.
3801 E. Marginal Way S.
Seattle, Wa. 98134

Attention: Mr. Kenneth Rone, Jr.

Subject: PCB Removal Project -- August 18 - 19, 1989
Your Order: S-3653
Our Order: SEED050

Dear Ken:

Enclosed for your review is a Spill Control Plan required when hazardous waste is being handled. Please note that your plant's EPA ID number is required on page 1 and that there are blanks for Ash Grove personnel notifications in the event of a spill on page 10. Please fill in these spaces as appropriate and return.

Our plan calls for de-energizing the Finishing Mill and Clinker Silo transformers around 7:00 AM, Friday, August 18, 1989. The Group 2 Silo transformer and remaining work on the Clinker Silo changeout will be completed on Saturday, August 19, 1989. Estimated completion of all work is 7:00 PM Saturday, August 19, 1989.

It is requested that at least one Ash Grove representative be onsite while work is being performed and that this representative is authorized to sign the Hazardous Waste Manifest documents for generated wastes removed from your facility and operate the plant's electrical equipment.

If there are any questions, please contact me at the number above. Thankyou for this opportunity to be of service.

Sincerely,

WESTINGHOUSE ELECTRIC CORPORATION

David E. Neustel

David E. Neustel,
Senior Engineer

Attachments:
Spill Plan
Job Plan - FYI DN

WESTINGHOUSE ELECTRIC CORPORATION

ENGINEERING SERVICE DIVISION

1180 ANDOVER PARK WEST
SEATTLE, WA. 98188
(206) 575-2345

July 27, 1989

Ash Grove Cement West, Inc.
3801 E. Marginal Way S.
Seattle, Wa. 98134

EPA ID Number: D009249616

Subject: Method of Removal and Spill Control Plan -- August 18-19, 1989
Your Order: S-3653
Our Order: SEED050

A. Erect warning yellow caution tape to inhibit personnel in the area.

B. Denergize transformer(s), install lockouts, and ground primary and secondary conductors.

C. Preparation for PCB handling:

1. Block nearby drains and hatch openings with 6 mil plastic sheeting and duct tape.

2. Lay 6 mil plastic sheeting along hose route, bermed or to be taped around hose.

3. Duct tape absorbent pads around hose connections and place metal drip pans beneath.

4. Inspect pumps, hose, fittings, and valves for proper condition, and orientation.

5. Re-inspect setup by second operator.

6. Prepare personnel using appropriate equipment from the "personnal safety equipment list" (attached).

   For normal pumping, items 1, 2, 3, 5, 6, and 8 - 14 will be used.

   If direct exposure to liquid is anticipated, or becomes necessary, items 4, 7, and 8 - 14 will be used.

7. Spill control kits shall be placed in the locations indicated below and shall have the covers removed during the moving of any PCB material:

Locations	Quantity
Substation work location(s)	1 per location
PCB Disposer Truck(s) and vicinity	1 per location/truck

D. Pump free flowing liquids from the bottom transformer drain valve into DOT

17E drums located in the near vicinity of PCB transformer(s). Drums to be on pallets with 6 mil plastic sheeting underneath and bermed.

E. Prior to moving the transformers, any visible leaks shall be epoxyed and absorbent pad(s) shall be taped around drain valve(s).

F. When the PCB transformer is being moved, two PCB control personnel (to be defined in Spill Response Procedure) shall escort the unit and be prepared to perform spill response procedures. Moving to be accomplished using skates, jacks, rollers, bars, forklift, and crane as required.

G. Place all contaminated solid waste material in DOT 17C drums.

H. Install new transformer(s) in place of PCB unit(s) where required. Rig into place with crane, forklift, skates, jacks, rollers, and bars as required.

I. Perform ratio and megger tests on new transformer(s).

J. Remove lockouts, energize transformer(s), verify secondary voltages and phase sequence prior to applying loads.